IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

JOHN DOE,)
Plaintiff,)) Case No. 3:19-cv-38
v.	
THE RECTOR AND VISITORS)
OF THE UNIVERSITY OF VIRGINIA, et al.)
Defendants.)

PLAINTIFF'S MOTION TO PLACE DEFENDANTS' EXHIBIT UNDER SEAL

Plaintiff, John Doe ("Mr. Doe"), by counsel, for his Motion to Place Defendants' Exhibit Under Seal, states at follows:

- 1. Defendants filed their response to Plaintiff's motion for a temporary restraining order and preliminary injunction on June 26, 2019 (Document 6).
- 2. Plaintiff filed a motion for leave to file under a pseudonym, to protect the Plaintiff, Ms. Roe, and the witnesses, which has not yet been heard by the Court.
- 3. Attached to the Defendants' response was a redacted version of the Final Investigation Report in the underlying Title IX investigation involving Mr. Doe.
- 4. The Final Investigation Report, though names have been redacted, leaves enough information to reveal the identity of Plaintiff, which could cause Plaintiff irreparable harm.
- 5. Similarly, it leaves enough information to reveal the identity of Ms. Roe, the complainant in this matter.

6. Plaintiff moves the Court to place Defendants' exhibit (Document 6-1) under seal, pending the Court's decision on Plaintiff's motion for leave to file under a pseudonym.

WHEREFORE, John Doe respectfully requests Document 6-1 filed by Defendants be placed under seal, and for all other relief the Court deems proper and appropriate.

JOHN DOE

By counsel

ST. JOHN, BOWLING, LAWRENCE & QUAGLIANA, LLP

By: /s/ Rhonda Quagliana

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Counsel for Plaintiff John Doe

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: counsel of record; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

/s/ Rhonda Quagliana